

Robert Benjamin

From: Randall Thompson
Sent: Friday, February 19, 2016 8:23 AM
To: John Fuss
Subject: FW: Axim Impressions, LLC

Hi, John. Here's another message that might be of interest to you.

From: West, David [David.West@stantec.com]
Sent: Thursday, February 18, 2016 2:35 PM
To: Randall Thompson
Cc: Alvin Pratt
Subject: Axim Impressions, LLC

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Randy,

Axiom Impressions, LLC (Axiom), Construction Permit No. 970052P, had an initial start-up date of September 11, 2015. The following items were submitted to the Air Pollution Control Division today:

1. Construction Permit 970052P, signed by the plant manager
2. Completed APC 100 form, signed by the plant manager

As required in the permit, these documents are being submitted so that the facility operating permit can be issued. As prescribed in Permit Condition 12.b, "Emissions tests shall include an initial test within 120 days of initial startup of new printers/dryers,....". To this point, Axiom has encountered difficulties in scheduling adequate production to ensure that at least 50 percent of the presses will be in operation for the initial test. Axiom does anticipate having adequate production for this in April and we are in the process of planning for an initial performance test on April 2, 2016. In addition to the required test plan and protocol and test date notification, we are planning to prepare an extension request for performing the initial test.

I have discussed the potential test dates with Alvin Pratt and during our conversation he mentioned that the requirement for the initial test could be waived. His position was based on experience with portable asphalt plants that are assembled and tested in one location and then moved to a separate location and reassembled in the identical configuration. For portable asphalt plants, a performance test following relocation of a tested unit is not required. He did not recall this being applied to a regenerative thermal oxidizer (RTO). The RTO was tested April 12, 2014 when located at 106 Western Drive, Portland, TN. The RTO and presses have been relocated to 104 Challenger Drive, Portland, TN. The relocation of Axiom's RTO could be viewed in a similar manner, the control device (and associated process equipment) has been moved to the new plant location but no changes have been made to the process equipment (other than the number of presses controlled by the RTO has reduced from seven to five) or control equipment. What is your interpretation regarding this situation – can the requirement to conduct an initial test be waived? If the requirement to conduct an initial test can be waived, what documentation will you require from Axiom?

On behalf of Axiom, I appreciate your assistance with this. Please contact me with any questions.

Thanks,
David

David West, CESCO